

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

WORKERS UNITED,

Plaintiff,

v.

STARBUCKS CORPORATION,

Defendant.

Civil Action No. 2:23-cv-4036

JOINT MOTION FOR AN EXTENSION

Plaintiff Workers United and Defendant Starbucks Corporation (“Starbucks”) (collectively, the “Moving Parties”), hereby jointly move the Court for an extension of time for Starbucks to respond to the Amended Complaint (Dkt. No. 27). This extension is needed in order to facilitate the Moving Parties’ good-faith negotiations subsequent to alternative dispute resolution via private mediation. In support thereof, the Moving Parties state as follows:

1. On October 18, 2023, Plaintiff filed a Complaint against Starbucks in this Court. (Dkt. No. 1).

On October 18, 2023, Defendant Starbucks filed a complaint in the Southern District of Iowa. That case involves the same Parties, Workers United and Starbucks, and related claims and facts. *See Starbucks Corp. v. Workers United*, No. 23-00068 (S.D. Iowa) (the “Iowa Action”).

2. On November 20, 2023, this Court granted Starbucks an extension to answer, move, or otherwise respond to the Complaint until January 22, 2024. (Dkt. No. 13).

3. On December 1, 2023, in the Iowa Action, Judge Locher granted an extension to move or otherwise respond to Starbucks’ First Amended Complaint until January 22, 2024.

4. On January 18, 2024, the Moving Parties sought a stay in both this action and the Iowa Action to facilitate their efforts to pursue alternative dispute resolution, and a stay was entered in the Iowa Action the same day. On January 19, 2024, this Court denied the request for a stay in this matter. (Dkt. No. 16).

Thereafter, Starbucks timely filed a Motion to Dismiss on January 22, 2024 (Dkt. No. 19), and Workers United filed a First Amended Complaint on February 12, 2024 (Dkt. No. 27).

5. On February 21, 2024, the Moving Parties participated in a full-day mediation session with Mr. David Geronemus, Esq. That session was productive, and the Moving Parties agreed to engage in further good-faith negotiations.

6. On February 23, 2024, the Moving Parties filed a joint motion to stay proceedings in this Court, and a stay was entered February 27, 2024, resetting the deadline to respond to the First Amended Complaint in this case to March 18, 2024. (Dkt. No. 31).

Since the mediation session and the Court's order of February 23, 2024, the Moving Parties have made additional progress towards resolution of this dispute.

7. On February 27, 2024, Starbucks and Workers United announced publicly that they had agreed to begin discussions on a foundational framework to achieve the resolution of litigation between them, including this case, along with other matters.¹

8. The Moving Parties have continued to work towards a global resolution of the litigation between them and other non-litigation disputes, but need additional time given the large number and complexity of the issues.

¹ See *Workers United and Starbucks Agree on Path Forward* (Feb. 27, 2024), <https://sbworkersunited.org/press/workers-united-and-starbucks-agree-on-path-forward>; *Message from Sara: Starbucks and Workers United Agree on Path Forward* (Feb. 27, 2024), <https://stories.starbucks.com/press/2024/message-from-sara-starbucks-and-workers-united-agree-on-path-forward>.

The Iowa Action is currently stayed until April 30, 2024 to give space for the Moving Parties' ongoing discussions.

9. The Moving Parties submit that their negotiations will be aided by a corresponding extension in this matter so that they may focus their time, efforts, and resources on further negotiations to seek an early resolution of this matter, without concurrently engaging in motions practice in this Court, which will also promote judicial economy. Accordingly, the Moving Parties respectfully move this Court for an extension of Starbucks' deadline to respond to answer, move, or otherwise respond to the First Amended Complaint.

10. The motion is made in good faith and is not interposed for delay or any other improper purpose.

11. The Moving Parties agree that the filing of this joint Motion shall not be to the prejudice of any party, including but not limited to a party citing to any delay in another party's claim, defense, motion, or argument on account of this Motion.

WHEREFORE, the Moving Parties respectfully request the Court shall extend the deadline for Starbucks to respond to Workers United's First Amended Complaint until April 30, 2024.

Respectfully submitted,

Dated: March 13, 2024

DLA PIPER LLP

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*Attorneys for Defendant Starbucks
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CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed a copy of the foregoing Joint Motion for an Extension and accompanying Proposed Order with the Clerk of Court using the CM/ECF system, which will automatically notify all counsel of record.

Dated: March 13, 2024

/s/ Daniel M. Rosenthal
Daniel M. Rosenthal